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*Attorneys for Claimant First 100, LLC*

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

UNITED STATES OF AMERICA,

Plaintiff,

v.

Approximately 69,370 Bitcoin (BTC),  
Bitcoin Gold (BTG), Bitcoin SV (BSV), and  
Bitcoin Cash (BCH) seized from  
1HQ3Go3ggs8pFnXuHVHRytPCq5fGG8Hb  
hx,

Defendant.

First 100, LLC

Claimant.

Case No. 20-7811-RS

**VERIFIED CLAIM AND STATEMENT  
OF INTEREST BY FIRST 100, LLC**

**FILED UNDER SEAL**

Judge: Hon. Richard Seeborg  
Courtroom: 3  
Case Filed: November 5, 2020  
FAC Filed: November 20, 2020  
Trial Date: TBD

## VERIFIED CLAIM AND STATEMENT OF INTEREST

**NOTICE OF CLAIM**

Pursuant to 18 USC, sections 983(a)(4)(A) and Rules C(6) and G(5) of the Federal Supplemental Rules for Admiralty or Maritime Claims or Forfeiture Actions, claimant First 100, LLC (“Claimant First 100”) and claimant 1<sup>st</sup> One Hundred Holdings, LLC (“Claimant 1<sup>st</sup> One Hundred”) and together with Claimant First 100, “Claimants”) hereby timely claim an interest in all or a portion of the defendant properties that are the subject of this forfeiture action brought by the United States of America (the “Plaintiff”).

**CLAIM**

1. Each Claimant is a Nevada limited liability company with an address of 10170 W Tropicana Ave, Suite 156-290, Las Vegas, NV 89148.

2. On or about March 28, 2017, Claimants jointly and severally obtained a judgment in the amount of \$2,211,039,718.46 against an individual, who, upon information and belief, is understood to be Individual X in the instant matter or a person associated with Individual X.

3. On or about July 31, 2017, an individual, who, upon information and belief, is understood to be Individual X in the instant matter or a person associated with Individual X, filed a Chapter 7 bankruptcy petition in the United States Bankruptcy Court, District of Nevada (the “Bankruptcy Court”), pending as Case No. 17-14166-BTB.

4. In response, Claimants, as judgment creditors, brought an adversary proceeding to have such judgment declared nondischargeable.

5. Claimants’ judgment was deemed nondischargeable by the Bankruptcy Court through a judgment of nondischargeability entered on August 6, 2018.

6. Claimants claim an interest in the Defendant Property, approximately 69,370 BTC Bitcoin (“BTC”), Bitcoin Gold (“BTG”), Bitcoin SV (“BSV”), Bitcoin Cash (“BCH”), and future Bitcoin hard forks (collectively the “Bitcoin”) seized from Individual X’s wallet number 1HQ3Go3ggs8pFnXuHVHRytPCq5fGG8Hbhx (the “1HQ3 wallet”) and currently in the possession of the United States.

1           7.     Claimants are informed and believe that Plaintiff took possession of the  
2 Defendant Property by consent agreement from Individual X on or about November 3, 2020,  
3 more than three years subsequent to Claimants' March 28, 2017 Judgment Creditor Status, as  
4 found to be non-dischargeable by the Bankruptcy Court.

5           8.     Forfeiture legal principals and precedent dictate that Claimants, as judgment  
6 creditors, are entitled to unencumbered right, title and ownership of the claims for the  
7 approximately 69,370 Bitcoin that were formerly held in an account owned by Individual X, or  
8 a party associated with Individual X, but Claimants require additional information that is  
9 currently not publicly available to determine if the Judgment Debtor is, in fact, Individual X in  
10 the instant matter, or a person associated with Individual X.

11           9.     As a result of the above, Claimants assert and allege that their right and title to the  
12 Defendant Property is superior to that of Silk Road, Individual X and/or any other putative  
13 claimant.

14           10.    Claimants claim an interest in the Defendant Property as innocent "owners,"  
15 within the meaning of 18 USC section 983(d)(6) and 28 Code of Federal Regulations section  
16 9.2, pursuant to 18 USC section 983(d)(3), insofar as Claimants can show they are material  
17 Judgment Creditors of Individual X or of a person associated with Individual X, that they did  
18 not know of any illegal conduct, that they were without cause to know that the Defendant  
19 Property was subject to forfeiture, and they can prove their right to the Defendant Property by  
20 way of the Bankruptcy Court Order evidencing non-dischargeability.

21           11.    Each Claimant is also both a "victim" and "judgment creditor" within the  
22 meaning of 28 CFR § 9.2.

23           12.    Claimants contest forfeiture of the Defendant Property, seek to enjoin the  
24 liquidation of the Defendant Property in this action, and seek the turnover of the Defendant  
25 Property to Claimants (and any other portion of Defendant Property that belongs to Claimants  
26 for which insufficient information is available insofar as no Notice of Forfeiture has been  
27 provided to Claimants), the rightful owners of such Property, by way of the Judgment and  
28 finding of nondischargeability by the Bankruptcy Court on August 6, 2018.

Dated: March 16, 2021

FOX ROTHSCHILD LLP

By: /s/ Jaemin Chang

JAEMIN CHANG

JEFF NICHOLAS (Pro Hac Vice To Be Filed)

Dated: March 16, 2021

THE LAW OFFICES OF GUY A. LEWIS

By: /s/ Guy A. Lewis

GUY A. LEWIS

(Pro Hac Vice To Be Filed)

**VERIFICATION**

I, the undersigned, certify and declare that I have read the foregoing Verified Notice of Claim and know its contents. The matters stated in the foregoing document are true of my own knowledge and belief except as to those matters explicitly stated on information and belief, and as to those matters, I believe them to be true.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct to the best of my knowledge. I understand that a false statement or claim may subject a person to prosecution.

Dated: March 16, 2021

FIRST 100, LLC

By:   
Jay Bloom, Manager  
SJC VENTURES HOLDING LLC

1<sup>st</sup> ONE HUNDRED HOLDINGS, LLC

By:   
Jay Bloom, Manager  
SJC VENTURES HOLDING LLC